

3.500 LAWRENCE
SYNTEX

MISSOURI DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
WATER QUALITY PROGRAM

MEMORANDUM

TO Jim O'DENDALL FROM Jim BURRIS
SUBJECT STORAGE OF PLOXIN DATE 3-19-75
SYNTEX - VERONA PLANT

AS YOU REQUESTED DURING OUR RECENT CONVERSATION
PLEASE FIND ATTACHED A COPY OF OUR FILES ON
THE SUBJECT,

IN REVIEWING THE ATTACHMENTS I BELIEVE
THAT COPIES SHOULD BE CONTAINED IN C.O. FILES.
IF THIS IS NOT THE CASE PLEASE LET ME
KNOW

Jim

TES

Site:	<u>Syntex-Verona</u>
ID#:	<u>MO0007452154</u>
Break:	<u>2.4</u>
Other:	<u>3-19-75</u>

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2.0



40039207
04-00 SUPERFUND RECORDS

49/7-8973

FEB 20 1975

February 18, 1975

Mr. James A. Burris, P.E.
Acting Chief, Water Quality Program
Springfield Regional Office
Department of Natural Resources
1155 East Cherokee
Springfield, Missouri 65807

Dear Jim:

Attached is a copy of our "Storage and Emergency Spill Procedure for Still Residues containing Dioxine" at the Verona Plant. Copies are in the hands of Plant Manager William Zay, Production Superintendent Richard Bell, Plant Chemist Jim Long, & Area Supervisor Dewey Vanderhoof. The Shift Supervisors have all been instructed in the procedure to be followed if anything should happen to this storage tank during their shift.

You will be kept informed of any change in the status of this still residue which is the property of NEPACCO. I am currently investigating a safe method of disposal of this hazardous material with approval of CDC located in Atlanta, Georgia. I am also attaching a copy of their letter dated October 2, 1974 for your information.

The material does not appear to be water soluble, but we will treat it as if it were and will see that none of it enters the water of Missouri.

Thanks for your help in this matter.

Yours truly,

Godfrey J. Moll
Godfrey J. Moll
Vice President, Operations

xc: Gene Wallace, Engineering Manager
Bill Zay, Plant Manager

Attachments

69/7-01431

SYNTEX AGRIBUSINESS, INC.
NUTRITION AND CHEMICAL DIVISION
VERONA PLANT

2/12/75

Storage and Emergency Spill Procedure for Still Residues containing Dioxin
(2,3,7,8 - Tetrachlorodibenzodioxin or TCDD)

Description of Storage:

The distillation residues from the NEPACCO distillation unit D-3 (750-gallon glass lined reactor) were collected for disposal by high temperature incineration in an insulated, steam-heated (presently disconnected) 7,500 gallon steel tank G-7. When NEPACCO ceased operations in January, 1972, they left about 4,300 to 4,600 gallons of this residue in the tank. Preliminary tests by the Center for Disease Control, HEW, PHS at Atlanta, Georgia indicates concentrations of TCDD in the range of 1,000 ppm. This tank has remained inactive and untouched until sampled by Dr. Coleman (Nick) Carter of CDC in August, 1974.

The tank is on a floor level concrete slab adjacent to the west side of Building V-11. A three foot high concrete block dike has been constructed around the tank to preclude stormwater from accumulating or flowing under the tank. It is clearly labeled "Danger-Hazardous Material."

Hazard:

TCDD is extremely toxic. The still residue containing in the range of 1,000 ppm TCDD stored in tank G-7 is very viscous (at room temperature it flows like cold road tar), therefore, it will not readily flow if the tank developed a leak.

Since TCDD can be highly toxic by skin absorption, all personnel assigned to work with accidental spills should be adequately protected against contact and should be instructed to wash down immediately after any such work. Proper protective clothing (rubber gloves, plastic face shields, rubber aprons and boots) must be worn.

Spill Plan:

If any of the residue leaks or is spilled in the diked area or during any transfer for disposal by incineration, the spilled residue is to be absorbed on cob meal and deposited in sealed plastic bags in fiber drums for disposal by proper incineration. It should be labeled "Danger-Hazardous Material" and include the date of the spill, the number of containers, and the names of all individuals who were assigned to the clean-up. All clean-up equipment that comes in contact with the residue should be deposited in sealed plastic bags in fiber drums for disposal by proper incineration also.

These drums will be stored in the small metal building to the west of Building V-11, which will at that time have a sign placed on the door as to the contents of these drums.

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